

EXHIBIT F – Part 2 of 2

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>"misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "deliv*" OR "undeliv*" OR "ship*" OR "incompl*" OR "bundl*" OR "unbundl*" OR "un-bundl*" OR "sever*" OR "element*" OR "component*" OR "part*" OR "futur*" OR "past*" OR "sched*" OR "post*" OR "clos*" OR "tim*" OR "shift*" OR "mov*" OR "push*" OR "pull*" OR "nudg*" OR "stick*" OR "plac*" OR "drawer*" OR "fil*" OR "shel*" OR "wait*" OR "delay*" OR "hold*" OR "held*" OR "check*" OR "receipt*" OR "money*" OR "revenu*" OR "incom*" OR "terminat*" OR "fir*" OR "hir*" OR "dismiss*" OR "leav*" OR "resign*" OR "transfer*" OR "let go*" OR "let-go*" OR "reduc*" OR "control*" OR "Peter" OR "Hemme" OR "CFO" OR "C.F.O." OR "Chief Financial Officer*" OR "Vice President*" OR "V.P." OR "VP" OR "Steve" OR "Stephen" OR "Nill" OR "CEO" OR "C.E.O." OR "Presid*" OR "Chair*" OR "Board*" OR "Hassan" OR "Ahmed" OR "Eric" OR "Pratt" OR "Cliff" OR "Clifford" OR "William" OR "Will" OR "Bill" OR "Mainor" OR "Phil*" OR "Bronsdon" OR "Michael" OR "Mike" OR "Perusse" OR "Perrusse" OR "Perusse" OR "Perussi" OR "Heidi" OR "Carter" OR "point*" OR "gopher*" OR "Foreign Motors West" OR "dealership*" OR "car*" OR "auto*" OR "sedan*" OR "coup*" OR "roadster*" OR "Mercedes*" OR "BMW*" OR "B.M.W.*" OR "beemer*" OR "SUV*" OR "S.U.V.*" OR "customer*" OR "press release*" OR "dat*" OR "backdat*" OR "back-dat*" OR "back dat*" OR "backfil*" OR "back-fil*" OR "back fl*" OR "prior*" OR "before*" OR "after*" OR "subsequent*" OR "adequ*" OR "inadequ*" OR "reserv*" OR "scor*" OR "cushion*" OR "featur*" OR "releas*" OR "version*" OR "platform*" OR "plat-form*" OR "plat form*" OR "produc*" OR "roadmap*" OR "road map*" OR "road-map*" OR "securit*" OR "stock*" OR "shar*" OR "equit*" OR "option*" OR "in-the-money" OR "in the money" OR "cheap stock*" OR "cheap-stock*" OR "cheapstock*" OR "award*" OR "reward*" OR "grant*" OR "bonus*" OR "mileston*" OR "mile-ston*" OR "requir*" OR "TRU" OR "I.R.U." OR "indefeasible right*" OR "Broadband Util*" OR "BBU" OR "B.B.U." OR "BU" OR "B.U." OR "Ansari" OR "Hamid" OR "Securities and Exchange Commission" OR "S.E.C." OR "SEC" OR "commission*" OR "agenc*" OR "Department of Just*" OR "Dep't. of Just*" OR "Dept. of Just*" OR "Dept of Just*" OR "D.O.J." OR "DOJ*" OR "NASD*" OR "N.A.S.D.*" OR "initial public offering*" OR "I.P.O." OR "IPO" OR "scrub*" OR "eras*" OR "clean*" OR "clear*" OR "delet*" OR "destr*" OR "irreg*" OR</p>	<p>Sonus proposes, Sonus therefore requests deletion of this Query or portions thereof.</p> <ul style="list-style-type: none"> To the extent this Query is not duplicative of Nos. 44 and 71 with edits as proposed, Sonus does not accept this Query. The court, in its Order entered May 10, 2006, explicitly rejected Plaintiff's "revenue linearity" theory of motive. Dkt. No. 149 at p. 38. Sonus objects to those terms which relate solely to Plaintiff's already-dismissed theory, including but not limited to: "rough*", "smooth*", "erratic*", and "inconsistent*". Many terms in this Query are objectionable due to their broad, non-specific nature, including but not limited to: "PO" (captures all words beginning with the letters "po") "tim*", (see response to Query No. 20, <i>supra</i>) "fir*", (all uses of the word "first," among other things), and "BU" (all words beginning with the letters "bu" including the word "but"). Sonus objects to the inclusion of first names as overly broad and burdensome. The 86,699 "hits" generated by this Query underscore its overly broad and burdensome nature. Sonus is willing to discuss with Lead Plaintiff mutually acceptable edits to this Query that would render it more likely to yield a more tailored and less burdensome set of documents.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>"bump*" OR "jagg*" OR "rough*" OR "smooth*" OR "erratic*" OR "inconsistent*" OR "incident*" OR "consid*" OR "memo*" OR "empt*" OR "legal*" OR "miss*" OR "contin*" OR "earn*" OR "unearn*" OR "s/w*" OR "h/w*" OR "hardwar*" OR "Ernst & Young*" OR "Ernst*" OR "EandY*" OR "E and Y*" OR "E+Y*" OR "E + Y*" OR "EY*" OR "E / Y*" OR "EY*" OR "E&Y*" OR "E & Y*" OR "ey.com" OR "Andersen*" OR "Arthur Andersen" OR "arthurandersen.com" OR "Huron" OR "huronconsultinggroup.com" OR "PricewaterhouseCoop*" OR "PwC" OR "pwc.com"))</p>	ACCEPT
<p>[86,699 hits]</p> <p>33. (("AT&T" OR "ATT" OR "ATWS" OR "AT and T" OR "ATandT" OR "AWS" OR "ATTWS" OR "A T and T" OR "A T & T" OR "AT+T" OR "A T + T" OR "AT&TW*" OR "ATTW*" OR "AT+TW*" OR "Wireless" OR "Wire-less") #50 AND ("revenue*" OR "recogni*" OR "accept*" OR "defer*" OR "upgrade*" OR "ship*" OR "maintenance" OR "rev*" OR "purchas*" OR "buy*" OR "agree*" OR "contract*" OR "compl*" OR "fraud*" OR "fail*" OR "impropr*" OR "wrong*" OR "mistak*" OR "error*" OR "illeg*" OR "ICFC" OR "conflict*" OR "intern*" OR "settle*" OR "breach*" OR "settlement agree*" OR "audit*" OR "early" OR "premiatur*" OR "improper*" OR "partial*" OR "book*" OR "accounted" OR "purchase order" OR "invoice*" OR "PO" OR "P.O." OR "software" OR "updat*" OR "letter agree*" OR "transact*" OR "erroneous*" OR "incorrect*" OR "feature request*" OR "F.R.*" OR "FR*" OR "technology commitment letter*" OR "T.C.L.*" OR "TCL*" OR "lab equip*" OR "useful li*" OR "equipment li*" OR "gate six" OR "gate-six" OR "gate 6" OR "gate 6" OR "gate6" OR "gatesix" OR "LA Softswitch" OR "LA" OR "L.A." OR "local access*" OR "local-access*" OR "Los Angeles" OR "Louisiana" OR "Tandem*" OR "National" OR "LD" OR "L.D." OR "L-D" OR "long dist*" OR "long-dist*" OR "GSM-MAP" OR "MAP*" OR "ANSI-41" OR "ANSI 41" OR "ANSI41" OR "spar*" OR "Commerce" OR "Anaheim" OR "project*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "inten*" OR "circumven*" OR "account*" OR "acct*" OR "financ*" OR "main*" OR "carv*" OR "settl*" OR "specif*" OR "upgrad*" OR "right*" OR "accept*" OR "confirm*" OR "recog*" OR "instal*" OR "SOP 97-2" OR "SOP 98-9" OR "S.O.P. 97-2" OR "S.O.P. 98-9" OR "97-2" OR "97(2)" OR "972" OR "98-9" OR "98.9" OR "98(9)" OR "989" OR "procure*" OR "agree*" OR</p>	<p>NOT ACCEPT</p> <ul style="list-style-type: none"> The terms included in this Query are well beyond the scope of Plaintiff's Requests, including but not limited to: "useful li*", "equipment li*", "gate six", "gate-six", "gate 6", "gate6", "gatesix", "LA Softswitch", "LA", "L.A.", "local access*", "local-access*", "Los Angeles", "Louisiana", "Tandem*", "National", "LD", "L.D.", "L-D", "long dist", "GSM-MAP", "MAP", "ANSI-41", "ANSI 41", "ANSI41", "spar*", "Commerce", "Anaheim", "pull*", "nudg*", "stick*", "plac*", "drawer*", "Motors West", "dealership*", "car*", "auto", "sedan*", "coup*", "roadster*", "Mercedes*", "BMW*", "B.M.W.*", "beemer*", "SUV*", and "S.U.V.*" The terms "S.O.P. 97-2" OR "S.O.P. 98-9" OR "97-2" OR "97.2" OR "97(2)" OR "972" OR "98-9" OR "98.9" OR "98(9)" OR "989" are duplicative of Query No. 44, which Sonus has accepted with edits. The terms "Securities and Exchange Commission" OR "S.E.C." OR "SEC" OR "commission*" OR "agenc*" OR "Department of Just*" OR "Dep't. of Just*" OR "Dept. of Just*" OR "Dept of Just*" OR "D.O.J." OR "DOJ*" OR "NASD*" OR "N.A.S.D.*" are duplicative of Query No. 71, which Sonus has accepted with edits. The terms "Ernst & Young", "Ernst", "EandY*", "E and Y*", "E+Y*", "E + Y*", "E/Y*", "E / Y*", "EY*",

PROPOSED QUERY & HIT COUNTS	ACCEPT/NOT ACCEPT
<p>"agmt*" OR "agrm't*" OR "compact*" OR "condit*" OR "sid*" OR "persuad*" OR "suggest*" OR "languag*" OR "letterhead*" OR "letter-head*" OR "letter head*" OR "classif*" OR "misclassif*" OR "mis-classif*" OR "treat*" OR "adjust*" OR "alter*" OR "modif*" OR "manip*" OR "mislead*" OR "mis-lead*" OR "deceiv*" OR "decept*" OR "hid*" OR "disguis*" OR "ghos*" OR "invisib*" OR "irreg*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "improp*" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "deliv*" OR "undeli*" OR "ship*" OR "incompl*" OR "bundl*" OR "unbundl*" OR "un-bundl*" OR "sever*" OR "element*" OR "component*" OR "part*" OR "futur*" OR "past*" OR "sched*" OR "post*" OR "clos*" OR "tim*" OR "shift*" OR "mov*" OR "push*" OR "pull*" OR "nudg*" OR "stick*" OR "plac*" OR "drawer*" OR "fil*" OR "shel*" OR "wait*" OR "delay*" OR "hold*" OR "held*" OR "check*" OR "receipt*" OR "money*" OR "revenu*" OR "incom*" OR "terminal*" OR "fir*" OR "hir*" OR "dismiss*" OR "leav*" OR "resign*" OR "transfer*" OR "let go*" OR "let-go*" OR "reduc*" OR "control*" OR "Peter*" OR "Hemme*" OR "CFO*" OR "C.F.O." OR "Chief Financial Officer*" OR "Vice President*" OR "V.P." OR "VP*" OR "Steve*" OR "Stephen*" OR "Nill*" OR "CEO*" OR "C.E.O." OR "Presid*" OR "Chair*" OR "Board*" OR "Hassan*" OR "Ahmed*" OR "Eric*" OR "Pratt*" OR "Cliff*" OR "Clifford*" OR "Joe*" OR "Joseph*" OR "Mueller*" OR "Dav*" OR "Saska*" OR "Robert*" OR "Rob*" OR "Bob*" OR "Bortoff*" OR "Nancy*" OR "Foster*" OR "Christian*" OR "Chris*" OR "Syberg*" OR "Foreign Motors West*" OR "dealership*" OR "car*" OR "auto*" OR "sedan*" OR "coup*" OR "roadster*" OR "Mercedes*" OR "BMW*" OR "B.M.W.*" OR "beemer*" OR "SUV*" OR "S.U.V.*" OR "customer*" OR "press release*" OR "dat*" OR "backdat*" OR "back-dat*" OR "back dat*" OR "backfil*" OR "back-fil*" OR "back fil*" OR "prior*" OR "before*" OR "after*" OR "subsequent*" OR "adequ*" OR "inadequ*" OR "reserv*" OR "scor*" OR "cushion*" OR "featur*" OR "releas*" OR "version*" OR "platform*" OR "plat-form*" OR "plat form*" OR "produc*" OR "roadmap*" OR "road map*" OR "road-map*" OR "securit*" OR "stock*" OR "shar*" OR "equit*" OR "option*" OR "in-the-money*" OR "in the money*" OR "cheap stock*" OR "cheap-stock*" OR "cheapstock*" OR "award*" OR "reward*" OR "grant*" OR "bonus*" OR "mileston*" OR "mileston*" OR "requir*" OR "Securities and Exchange Commission*" OR "S.E.C." OR "SEC*" OR "commission*" OR "agenc*" OR</p>	<p>"E&Y*", "E & Y*", "ey.com," are duplicative of Query No. 67, which Sonus has accepted with edits.</p> <ul style="list-style-type: none"> The terms "Andersen*", "Arthur Andersen," and "arthurandersen.com" are duplicative of Query no. 70, which Sonus has accepted with edits. To the extent that this Query is duplicative of Nos. 44, 67, 70, and 71 with the edits Sonus proposes, Sonus therefore requests deletion of this Query or portions thereof. To the extent this Query is not duplicative of Nos. 44, 67, 70, and 71 with edits as proposed, Sonus does not accept this Query. Sonus objects to the inclusion of first names as overly broad and burdensome. The 160,269 "hits" generated by this Query underscore its egregiously broad and burdensome nature. Sonus is willing to discuss with Lead Plaintiff mutually acceptable edits to this Query that would render it more likely to yield a more tailored and less burdensome set of documents.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>"Department of Just*" OR "Dep't. of Just*" OR "Dept. of Just*" OR "Dept of Just*" OR "D.O.J." OR "DOJ*" OR "NASD*" OR "N.A.S.D.*" OR "initial public offering*" OR "I.P.O." OR "IPO" OR "scrub*" OR "eras*" OR "clean*" OR "clear*" OR "delet*" OR "destr*" OR "irreg*" OR "bump*" OR "jagg*" OR "rough*" OR "smooth*" OR "erratic*" OR "inconsistent*" OR "incent*" OR "consid*" OR "memo*" OR "empt*" OR "legal*" OR "miss*" OR "contin*" OR "earn*" OR "unearn*" OR "s/w*" OR "h/w*" OR "hardwar*" OR "Ernst & Young*" OR "Ernst*" OR "EandY*" OR "E and Y*" OR "E+Y*" OR "E + Y*" OR "E/Y*" OR "E / Y*" OR "EY*" OR "E&Y*" OR "E & Y*" OR "*ey.com" OR "Andersen*" OR "Arthur Andersen" OR "*arthurandersen.com" OR "Huron" OR "huronconsultinggroup.com" OR "PricewaterhouseCoop*" OR "PwC" OR "*pwc.com")</p> <p>[160,269 hits]</p>	
<p>34. ("org*" w/2 ("chart*" OR "structure*")) [see discussion in May 11, 2007 letter]</p> <p>[6,656 hits]</p>	ACCEPT
<p>35. ("employee*" w/2 ("handbook*" OR "manual*"))</p> <p>[767 hits]</p>	ACCEPT
<p>36. ("operat*" w/5 ("proced*" OR "manual*"))</p> <p>[10,357 hits]</p>	ACCEPT
<p>37. ("accounting" w/5 ("proced*" OR "polic*" OR "manual*"))</p> <p>[7,317 hits]</p>	ACCEPT

<i>PROPOSED QUERY & HIT COUNTS</i>	<i>ACCEPT/NOT ACCEPT</i>
<p>38. ("employee*" OR "employ*" OR "operat*" OR "accounting" OR "acctg*" OR "person*") AND ("handbook*" OR "manual*" OR "proced*" OR "polic*" OR "pract*")</p> <p>[146,255 hits]</p>	<p>ACCEPT WITH EDITS VIA NOS. 35, 36 AND 37 (DELETE AS DUPLICATIVE)</p> <ul style="list-style-type: none"> Not tailored to identify documents relevant to the claims or defenses of the parties nor reasonably calculated to lead to the discovery of admissible evidence. The 146,255 "hits" generated by this Query underscore its overly broad and burdensome nature. The relevant documents sought by this Query are likely to be identified with a numeric limiter ("w/#"), and to be identified by Query Nos. 35, 36 and 37, which seek the same information utilizing such a limiter. Query Nos. 35 through 37 thus renders this Query duplicative, and Sonus requests its deletion.
<p>39. ("revenue" w/5 w/25 "recog*") w/15 AND ("polic*" OR "proced*" OR "account*" OR "practice*" OR "compl*" OR "noncompl*" OR "non-compl*" OR "fail*" OR "lack*" OR "fraud" OR "misstate*" OR "faulty" OR "improp*")</p> <p>[34,208 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Not tailored to identify documents relevant to the claims or defenses of the parties nor reasonably calculated to lead to the discovery of admissible evidence. The term "fraud" is duplicative of No. 15. Defendants therefore request deletion of this term. The 34,208 "hits" generated by this Query underscore its overly broad and burdensome nature. Sonus will accept this Query with a numeric limiter as follows: (("revenue" w/ 25 "recog*") w/ 15 ("polic*" or "proced*" OR "account*" OR "practice*" OR "compl*" OR "noncompl*" OR "non-compl*" OR "fail*" OR "lack*" OR "misstate*" OR "faulty" OR "improp*")). If Plaintiff does not agree to this limiter, Sonus will not accept this Query.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
40. (("defer*" w/5 "revenue") w/15 ("polic*" OR "proced*" OR "account*" OR "practice*")) [7,959 hits]	ACCEPT
41. (("ship*" w/10 "revenue") w/15 ("polic*" OR "proced*" OR "account*" OR "practice*")) [4,783 hits]	ACCEPT
42. (("multiple" w/5 "element") w/15 ("polic*" OR "proced*" OR "account*" OR "practice*")) [1,286 hits]	ACCEPT
43. ("agree*" OR "arrang*" OR "contract*") w/25 ("hardware" OR "software" OR "h/w*" OR "s/w*") w/25-AND ("bundl*" OR "unbundl*" OR "un-bundl*" OR "segregat*" OR "separat*") w/25 ("polic*" OR "proced*" OR "account*" OR "practice*") [74,127 hits]	ACCEPT WITH EDITS <ul style="list-style-type: none"> • Not tailored to identify documents relevant to the claims or defenses of the parties nor reasonably calculated to lead to the discovery of admissible evidence. • The 74,127 "hits" generated by this Query underscore its overly broad and burdensome nature. • Sonus will accept this Query with a numeric limiter, as follows: (("hardware" OR "software" OR "h/w*" OR "s/w*") w/25 ("bundl*" OR "unbundl*" OR "un-bundl*" OR "segregat*" OR "separat*")). If Plaintiff does not agree to this limiter, Sonus will not accept this Query.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
44. ("97.2" OR "SAB104" OR "98.9" OR "97(2)" OR "972" OR "97.2" OR "98(9)" OR "989" OR "98.9") [84,506 hits]	ACCEPT WITH EDITS <ul style="list-style-type: none"> • The 84,506 "hits" generated by this Query suggest that one or more terms may be rendering this Query overly broad. • Sonus believes the large number of hits may be related to the inclusion of "989" and "972," as those numbers may exist in other broad and non-relevant contexts, such as on spreadsheets or in telephone numbers. • Sonus is willing to discuss with Lead Plaintiff mutually acceptable edits to this Query that would render it more likely to yield a more tailored and less burdensome set of documents.
45. ("press release*" OR "PR") w/50 AND ("financial" w/10 ("results" OR "statement*") w/20 AND ("testat*" OR "revis*" OR "adjust*")) OR ("accounting" w/10 ("practice*" OR "polic*" OR "proc*")) [11,173 hits]	ACCEPT
46. ("10Q" OR "10-Q" OR "10Q/A" OR "10QA" OR "10-QA") [20,335 hits]	ACCEPT
47. ("10K" OR "10-K") [40,776 hits]	ACCEPT
48. ("10KA" OR "10-K/A" OR "10-KA") [4,239 hits]	ACCEPT
49. ("Form 3") [2,656 hits]	ACCEPT

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
50. ("Form 4") [5,570 hits]	ACCEPT
51. ("Form 5") [3,232 hits]	ACCEPT
52. ("8K" OR "8-K") [13,957 hits]	ACCEPT
53. ("424B5" OR "424-B-5" OR "424B-5" OR "424(b)(5)") [20 hits]	ACCEPT
54. ("S-8" OR "S8") [11,468 hits]	ACCEPT
55. (("prospectus*" OR "supplement*" OR "offering*" OR "follow on" OR "follow-on" OR "followon") #50 AND ("4/23" OR "04/23" OR "4-23" OR "04-23" OR "4/23/03" OR "04/23/03" OR "4-23-03" OR "04-23-03" OR "4/23/2003" OR "04/23/2003" OR "4-23-2003" OR "04-23-2003" OR "April 23*" OR "Apr. 23*" OR ("goldman" OR "sachs" OR "GS" OR "G.S." OR "*goldmansachs.com" OR "analy*" OR "stock*" OR "capital"))) [62,958 hits]	ACCEPT WITH EDITS <ul style="list-style-type: none"> • Sonus will accept this proposed Query with the previously suggested numeric limiter, which would ensure that a range of documents responsive to Request No. 22, as limited by Sonus' Response No. 22, would meet this criterion. • Please explain what reasonable basis Plaintiff might have not to agree to such limitation. • The 62,958 "hits" generated by this Query underscore its overly broad and burdensome nature.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>56. ("prospectus*" OR "supplement*" OR "offering*" OR "follow on" OR "follow-on" OR "followon") #450 AND ("9/23" OR "09/23" OR "9-23" OR "09-23" OR "9/23/03" OR "09/23/03" OR "9-23-03" OR "09-23-03" OR "09/23/2003" OR "9-23-2003" OR "09-23-2003" OR "September 23*" OR "Sept. 23*" OR ("goldman" OR "sachs" OR "GS" OR "G.S." OR "*goldmansachs.com" OR "analy*" OR "stock*" OR "capital"))</p> <p>[62,763 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query with the previously suggested numeric limiter, which would ensure that a range of documents responsive to Request No. 22, as limited by Sonus' Response No. 22, would meet this criterion. Please explain what reasonable basis Plaintiff might have not to agree to such limitation. The 62,763 "hits" generated by this Query underscore its overly broad and burdensome nature.
<p>57. ("rais*" OR "bring* in" OR "obtain*" OR "procure*" OR "get*") w/5 "capital") AND (Date=2003) [Lead Plaintiff does not agree to date restriction.]</p> <p>[5,180 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query with the previously suggested date restriction, as Sonus is not obligated to provide any and all documents related to the Company's efforts or discussions regarding raising capital at any time, however unrelated to the allegations of this action. Please explain what reasonable basis Plaintiff might have not to agree to such limitation.
<p>58. ("Ernst & Young" OR "Ernst" OR "EandY*" OR "EY*" OR "E&Y*") #415 AND ("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR "trad*" OR "sale*") #440 AND ("stock*" OR "share*") #440 AND "Sonus"))</p> <p>[8,647 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query with the previously suggested numeric limiters, which would ensure that a range of documents likely to be responsive to Request No. 48 would meet this criterion. Please explain what reasonable basis Plaintiff might have not to agree to such limitation.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>59. ("Andersen" w/45 AND ("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*) w/40 AND ("stock*" OR "share*") w/40 AND "Sonus"))</p> <p>[3,356 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> • Sonus will accept this proposed Query with the previously suggested numeric limiters, which would ensure that a range of documents likely to be responsive to Request No. 60 would meet this criterion. • Please explain what reasonable basis Plaintiff might have not to agree to such a limitation.
<p>60. ("Huron" w/45 AND ("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*) w/40 AND ("stock*" OR "share*") w/40 AND "Sonus"))</p> <p>[1,168 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> • Sonus will accept this proposed Query with the previously suggested numeric limiters, which would ensure that a range of documents likely to be responsive to Request No. 54 would meet this criterion. • Please explain what reasonable basis Plaintiff might have not to agree to such a restriction.
<p>61. (("Wilmer*" OR "Hale*" OR "WH" OR "HD" OR "H&D" OR "WCPHD") w/45 AND ("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*) w/40 AND ("stock*" OR "share*") w/40 AND "Sonus"))</p> <p>[14,452 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> • Sonus will accept this proposed Query with the previously suggested numeric limiters, which would ensure that a range of documents likely to be responsive to Request No. 65 would meet this criterion. Otherwise, a whole host of documents (likely privileged documents or work product) mentioning, addressing, asking or copying counsel and relating in virtually any way to the market for Sonus stock, buy or sell ratings, trading rules or issues, and similarly irrelevant documents would meet this query. • Please explain what reasonable basis Plaintiff might have not to agree to such limitation.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>62. ("Ernst & Young" OR "Ernst" OR "EandY" OR "EY" OR "E&Y") w/15 AND ("invoice*" OR "bill*" OR "pay*" OR "engag*" OR "retain*" OR "term*" OR "indemni*" OR "condition*") [14,764 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query with the previously suggested numeric limiter, which would ensure that a range of documents likely to be responsive to Request Nos. 46 and 47 would meet this criterion. Please explain what reasonable basis Plaintiff might have not to agree to such a restriction.
<p>63. ("Andersen" w/15 AND ("invoice*" OR "bill*" OR "pay*" OR "engag*" OR "retain*" OR "term*" OR "indemni*" OR "condition*") [6,003 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query with the previously suggested numeric limiter, which would ensure that a range of documents likely to be responsive to Request Nos. 58 and 59 would meet this criterion. Please explain what reasonable basis Plaintiff might have not to agree to such a restriction.
<p>64. ("Huron" w/15 AND ("invoice*" OR "bill*" OR "pay*" OR "engag*" OR "retain*" OR "term*" OR "indemni*" OR "condition*")) [2,835 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query with the previously suggested numeric limiter, which would ensure that a range of documents likely to be responsive to Request Nos. 52 and 53 would meet this criterion. Please explain what reasonable basis Plaintiff might have not to agree to such a restriction.
<p>65. ("Ernst & Young" OR "Ernst" OR "EandY" OR "EY" OR "E&Y") w/15 "Restat*" AND (Date=2004) [Lead Plaintiff does not agree to date limitation.] [1,173 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query, and related Queries 66 and 67, with the previously suggested date restriction, which would ensure that a range of documents likely to be responsive to Request Nos. 47 and 48, as limited by Sonus' Responses Nos. 47 and 48, would meet this criterion. Please explain what reasonable basis Plaintiff might have not to agree to such a restriction.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>66. ("Ernst & Young" OR "Ernst" OR "EandY" OR "EY" OR "E&Y") w/25 ("Qwest" OR "Quest") AND (Date=2004) [Lead Plaintiff does not agree to date limitation.]</p> <p>[1,064 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> • Sonus will accept this proposed Query, and related Queries 65 and 67, with the previously suggested date restriction, which would ensure that a range of documents likely to be responsive to Request Nos. 47 and 48, as limited by Sonus' Responses Nos. 47 and 48, would meet this criterion. • Please explain what reasonable basis Plaintiff might have not to agree to such a restriction.
<p>67. ("Ernst & Young" OR "Ernst" OR "EandY" OR "EY" OR "E&Y") w/25 ("AT&T" OR "ATT" OR "ATWS" OR "AT and T" OR "ATandT" OR "AWS" OR "ATTWS") AND (Date=2004) [Lead Plaintiff does not agree to date limitation.]</p> <p>[809 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> • Sonus will accept this proposed Query, and related Queries 65 and 66, with the previously suggested date restriction, which would ensure that a range of documents likely to be responsive to Request Nos. 47 and 48, as limited by Sonus' Responses Nos. 47 and 48, would meet this criterion. • Please explain what reasonable basis Plaintiff might have not to agree to such a restriction.
<p>68. ("Andersen" w/15 AND "Restat*")</p> <p>[2,264 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> • Sonus will accept this proposed Query, and related Queries 69 and 70, with the previously suggested numeric limiter, which would ensure that a range of documents likely to be responsive to Request No. 58, as limited by Sonus Response No. 58, would meet this criterion. • Please explain what reasonable basis Plaintiff might have not to agree to such a restriction.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>69. ("Andersen" #415 AND ("Qwest" OR "Quest"))</p> <p>[2,037 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query, and related Queries 68 and 70, with the previously suggested numeric limiter, which would ensure that a range of documents within Sonus Response No. 58 would meet this criterion. Please explain what reasonable basis Plaintiff might have to not agree to such a restriction.
<p>70. ("Andersen" #415 AND ("AT&T" OR "ATT" OR "ATWS" OR "AT and T" OR "ATandT" OR "AWS" OR "ATTWS"))</p> <p>[2,114 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query, and related Queries 68 and 69, with the previously suggested numeric limiter, which would ensure that a range of documents within Sonus Response No. 58 would meet this criterion. Please explain what reasonable basis Plaintiff might have to not agree to such a restriction.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>71. ("SEC" OR "Securities and Exchange" OR "S.E.C." OR "FBI" OR "Bureau" OR "F.B.I." OR "DOJ" OR "Justice" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "National") w/45 AND ("subpoena*" OR "request*" OR "interview*" OR "testi*" OR "investig*" OR "witness" OR "depo*" OR "restat*" OR "re-stat*" OR "inqui*" OR "review*" OR "disclo*" OR "Hass*" OR "Ahmed" OR "Stephen" OR "Steve" OR "Steven" OR "Nill" OR "memo*" OR "letter*" OR "correspond*" OR "e-mail*" OR "email*" OR "checklist*" OR "attach*" OR "anal*" OR "scop*" OR "engag*" OR "bill*" OR "invoice*" OR "payment*" OR "check*" OR "audit*" OR "compil*" OR "meet*" OR "mtg*" OR "confer*" OR "tele*" OR "disagr*" OR "delin*" OR "refus*" OR "termin*" OR "ceas*" OR "irreg*" OR "fraud*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "illeg*" OR "improp*" OR "ICFC" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "mistak*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "spread*"))</p> <p>[131,910 hits]</p>	<p>ACCEPT WITH EDITS</p> <p><u>ACCEPT/NOT ACCEPT</u></p> <ul style="list-style-type: none"> The term "fraud" in this Query is duplicative of Query No. 15, which Sonus has accepted. Sonus therefore requests deletion of that term. Defendant objects to the following terms as overbroad and not tailored to identify documents relevant to the claims or defenses of the parties: "National," "review," "Stephen," "Steve," "Steven," "memo*" "letter*" "correspond*" "e-mail*" "email," "attach*" "scop*" "engag*" "bill*", "invoice*", "payment*", "check*", "checklist*", "attach*", "audit*", "compil*", "meet*", "mtg*", "confer*", "tele*", "Sonus accepts Query 71 with the deletion of those terms. Sonus would agree to add the following terms to these terms to address Plaintiff's requests in Query Nos. 73, 74, and 75: "Well*", "Hemme*", "government*", "gov't*", "govm*", and "agenc*," Sonus would accept this Query with deletion of the overbroad terms identified above; if Plaintiff does not accept those edits, Sonus will not accept this Query. The 131,910 "hits" generated by this Query underscore its overly broad and burdensome nature.
<p>72. ("SEC" OR "Securities and Exchange" OR "S.E.C." OR "FBI" OR "Bureau" OR "F.B.I." OR "DOJ" OR "Justice" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "National") w/45 AND ("subpoena*" OR "request*" OR "interview*" OR "testi*" OR "investig*" OR "witness" OR "depo*" OR "inqui*" OR "review*" OR "disclo*" AND ("Hass*" OR "Ahmed" OR "Stephen" OR "Steve" OR "Steven" OR "Nill"))</p> <p>[37,979 hits]</p>	<p>ACCEPT WITH EDITS VIA NO. 71 (DELETE AS DUPLICATIVE)</p> <ul style="list-style-type: none"> This Query, as drafted, is completely duplicative of Query No. 71 as drafted. Sonus therefore requests deletion of this Query, and has provided the response to both Queries under No. 71.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>73. (("SEC" OR "Securities and Exchange" OR "S.E.C." OR "FBI" OR "Bureau" OR "F.B.I." OR "DOJ" OR "Justice" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "National") w/15 AND ("subpoena*" OR "request*" OR "interview*" OR "testi*" OR "investig*" OR "witness" OR "depo*" OR "inqui*" OR "review*" OR "diselo*") AND ("Pet*" OR "Hemme" OR "Control*"))</p> <p>[55,119 hits]</p>	<p>ACCEPT WITH EDITS VIA NO. 71 (DELETE AS DUPLICATIVE)</p> <ul style="list-style-type: none"> Query No. 71 which Sonus accepts edits renders this Query duplicative. Sonus therefore requests deletion of this query. (Please note that Sonus has accepted the term "Hemme" as an addition to Query No. 71.)
<p>74. (("SEC" OR "Securities and Exchange" OR "S.E.C." OR "FBI" OR "Bureau" OR "F.B.I." OR "DOJ" OR "Justice" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "National") w/15 AND ("Well*"))</p> <p>[5,153 hits]</p>	<p>ACCEPT WITH EDITS VIA NO. 71 (DELETE AS DUPLICATIVE)</p> <ul style="list-style-type: none"> Query No. 71, which Sonus accepts with edits, renders this query duplicative. Sonus therefore requests deletion of this Query. (Please note that Sonus has accepted the term "Well*" as an addition to Query No. 71.)

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>75. ("SEC" OR "Securities and Exchange" OR "S.E.C." OR "commission*" OR "FBI" OR "F.B.I." OR "Bureau*" OR "Federal Bureau of Investigation" OR "Fed. Bureau of Invest*" OR "Fed Bureau of Invest*" OR "DOJ" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "N.A.S.D." OR "N.A.S.D.A.Q." OR "federal*" OR "stat*" OR "government*" OR "gov't*" OR "govm*" OR "agenc*" OR "department*" OR "dep't*" OR "dept*" AND ("doc*" OR "file*" OR "filing*" OR "account*" OR "acct*" OR "reven*" OR "earn*" OR "income*" OR "time*" OR "timing*" OR "manip*" OR "modif*" OR "adjust*" OR "irreg*" OR "fraud*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "illeg*" OR "improp*" OR "ICFC" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistak*" OR "mis-stat*" OR "misclassif*" OR "mis-classif*" OR "mistak*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*""))</p>	<p>ACCEPT WITH EDITS VIA NO. 71 (DELETE AS DUPLICATIVE)</p> <ul style="list-style-type: none"> • Not tailored to identify documents relevant to the claims or defenses of the parties nor reasonably calculated to lead to the discovery of admissible evidence. • All documents authored by, edited by, viewed by or sent to or from any custodian, in which the word "statement" or "department" appears in conjunction with any number of incredibly broad words and roots appear, including, but not limited to, "doc*", "file*", "account*", "reven*", "earn*", "income*", "time*", "timing*", would meet this criterion, including a vast universe of documents relating to any number of "accounts," customers or other aspect of the Company's business.
[506,033 hits]	<ul style="list-style-type: none"> • The "fraud" term in this query is duplicative of Query No. 15, which Sonus has accepted. Sonus therefore requests deletion of this term.
	<ul style="list-style-type: none"> • Sonus objects to the following terms as overly broad and not tailored to identify documents relevant to the claims or defenses of the parties: "federal*", "stat*", "department*", "dep't*", "dept*", "doc*" OR "file*" OR "filing*" OR "account*" OR "acct*" OR "reven*" OR "earn*" OR "income*" OR "time*" OR "timing*" OR "modif*" OR "adjust*."

<i>PROPOSED QUERY & HIT COUNTS</i>	<i>ACCEPT/NOT ACCEPT</i>
	<ul style="list-style-type: none"> • The following terms in this query are duplicative of Query No. 71, which Sonus has accepted: "SEC" OR "Securities and Exchange" OR "S.E.C." OR "commission*" OR "FBI" OR "F.B.I." OR "Bureau*" OR "Federal Bureau of Investigation" OR "Fed. Bureau of Invest*" OR "Fed Bureau of Invest*" OR "DOJ" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "N.A.S.D." OR "N.A.S.D.A.Q." "irreg*" "de-fraud*" "defraud*" "misconduct*" "illeg*" "control*" "misstate*" "mis-stat*" "mistat*" "miss-stat*" "classif*" "mis-classif*" "mistak*" "misrep*" "mis-rep*" "mislead*" "mislead*" "hid*" "deceiv*" and "dignis*". To the extent this Query is duplicative of Query No. 71, Sonus accepts this Query via No. 71, and requests deletion of these terms. To the extent this Query is not duplicative of Query No. 71, Sonus objects to the overbroad terms listed above, but is amenable to including the following terms in Query No. 71: "government*", "gov't*", "govm*", "agenc*" and "manip*." • The 506,033 "hits" generated by this Query underscore its egregiously broad and burdensome nature. • See <i>also</i> Sonus' Responses, General Objection No. 1. • Query No. 71, which Sonus accepts with edits, renders this query duplicative. Sonus therefore requests deletion of this Query. (Please note that Sonus has accepted the terms "government*", "gov't*", "govm*", and "agenc*" as additions to Query No. 71.)

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>76. ("SEC" OR "Securities and Exchange" OR "S.E.C." OR "FBI" OR "Bureau" OR "F.B.I." OR "DOJ" OR "Justice" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "National") w/45 AND ("subpo*"))</p> <p>[1,731 hits]</p>	<p>ACCEPT WITH EDITS VIA NO. 71 (DELETE AS DUPLICATIVE)</p> <ul style="list-style-type: none"> This Query, as drafted, is completely duplicative of Query No. 71 as drafted. Sonus therefore requests deletion of this Query, and has provided the response to both Queries under No. 71.
<p>77. (("Ahmed*" OR "Hassan*" OR "Hass*" w/5 AND ("stock*" OR "share*" OR "option*" OR "compensat*" OR "salar*" OR "bonus*") AND ("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*" OR "awar*" OR "grant*" OR "vest*" OR "sale*" OR "held*" OR "hold*"))</p> <p>[55,727 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Without a numeric limiter, a whole host of personal and irrelevant documents mentioning any person's compensation but also mentioning Ahmed in any context, would meet this criterion. To more closely identify relevant documents, Sonus will agree to this Query if it is edited to include a numeric limiter of no more than 50. Without this numeric limiter, Sonus will not accept this Query. The 55,727 "hits" generated by this Query underscore its overly broad and burdensome nature.
<p>78. (("Ahmed*" OR "Hass*" AND ("compensat*" OR "salar*" OR "bonus*" OR "cash*"))</p> <p>[34,699 hits]</p>	<p>ACCEPT WITH EDITS VIA NO. 77 (DELETE AS DUPLICATIVE)</p> <ul style="list-style-type: none"> Query No. 77 with edits proposed by Sonus, renders this Query duplicative. Sonus therefore requests deletion of this Query. Sonus is amenable to adding the term "cash*" to Query No. 77 if Plaintiff so desires.

<i><u>PROPOSED QUERY & HIT COUNTS</u></i>	<i><u>ACCEPT/NOT ACCEPT</u></i>
<p>79. (("Nill*" OR "Stephen*" OR "Steve") *#45 AND ("stock*" OR "share*" OR "option*" OR "compensat*" OR "salar*" OR "bonus*" AND ("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*" OR "awar*" OR "grant*" OR "vest*" OR "sale*" OR "held*" OR "hold*"))</p> <p>[67,694 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Without a numeric limiter, a whole host of personal and irrelevant documents mentioning any person's compensation but also mentioning Nill in any context, would meet this criterion. To more closely identify relevant documents, Sonus will agree to this Query if it is edited to include a numeric limiter of no more than 50. Without this numeric limiter, Sonus will not accept this Query. The 67,694 "hits" generated by this Query underscore its overly broad and burdensome nature.
<p>80. (("Steve*" OR "Stephen" OR "Nill*") AND ("compensat*" OR "salar*" OR "bonus*" OR "cash*"))</p> <p>[45,269 hits]</p>	<p>ACCEPT WITH EDITS VIA NO. 79 (DELETE AS DUPLICATIVE)</p> <ul style="list-style-type: none"> Query No. 79 with edits proposed by Sonus, renders this Query duplicative. Sonus therefore requests deletion of this Query. Sonus is amenable to adding the term "cash*" to Query No. 79 if Plaintiff so desires.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>81. ((("Hemme*" OR "Peter*") w/45 AND ("stock*" OR "share*" OR "option*" OR "compensat*" OR "salar*" OR "bonus*") AND ("stock*" OR "share*" OR "option*" OR "compensat*" OR "salar*" OR "bonus*") AND ("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*" OR "awar*" OR "grant*" OR "vest*" OR "sale*" OR "held*" OR "hold*"))</p> <p>[33,054 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Without a numeric limiter, a whole host of personal and irrelevant documents mentioning any person's compensation but also mentioning Hemme in any context, would meet this criterion. To more closely identify relevant documents, Sonus will agree to this Query if it is edited to include a numeric limiter of no more than 50. Without this numeric limiter, Sonus will not accept this Query. Please explain why ("stock*" OR "share*" OR "option*" OR "compensat*" OR "salar*" OR "bonus*") should be included twice in one query. Sonus objects to the inclusion of first names as overbroad and burdensome. The 33,054 "hits" generated by this Query underscore its overly broad and burdensome nature.
<p>82. ((("Pete*" OR "Peter" OR "Hemme*") AND ("compensat*" OR "salar*" OR "bonus*" OR "cash*"))</p> <p>[21,580 hits]</p>	<p>ACCEPT VIA NO. 81 (DELETE AS DUPLICATIVE)</p> <ul style="list-style-type: none"> This Query is largely duplicative of Query No. 81, which Sonus has accepted with edits. Sonus therefore requests that this request be deleted. Sonus is amenable to adding the term "cash*" to Query No. 81 if Plaintiff so desires.
<p>83. ((("Ahmed*" OR "Hassan*" OR "Hass*" w/45 w/30 ("chairman" OR "chair" OR "chair*" w/45 w/30 ("elect*" OR "appoint*" OR "made" OR "mak*" OR "promot*" OR "board*" OR "bd*" OR "dir*")) AND (Date--2003-[Lead Plaintiff does not agree to date limitation])</p> <p>[4,014 hits]</p>	<p>ACCEPT</p> <ul style="list-style-type: none"> Sonus objects to the deletion of the date restriction, which would ensure that a range of documents likely to be responsive to Request No. 85 would meet this criterion. Nonetheless, given the relatively low number of "hits," and in the spirit of cooperative discovery, Sonus accepts Query No. 83.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>84. ("Hemme*" OR "Peter*" OR "Pete*") w/15 AND ("fir*" OR "term*" OR "resign*" OR "transfer*" OR "demot*" OR "remov*" OR "transf*") AND (Date>2003)[Lead Plaintiff does not agree to date limitation]</p> <p>[54,024 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Without a numeric limiter, a whole host of personal and irrelevant documents mentioning any person's compensation but also mentioning Hemme in any context, would meet this criterion. To more closely identify relevant documents, Sonus will agree to this Query if it is edited to include a numeric limiter of no more than 50. Without this numeric limiter, Sonus will not accept this Query. Sonus objects to the inclusion of first names as overbroad and burdensome. Sonus accepts this Query with the deletion of "Peter*" and "Pete*," which are likely capturing a substantial amount of irrelevant documents. Sonus proposes deletion of the root "fir*" as thus far proposed by both parties, as "fir*" will capture all references to the word "first." If Lead Plaintiff desires to capture references to the words "fire*" or "firing*" as they might relate to termination of Mr. Hemme's employment, Sonus is amenable to using those terms.
<p>85. ("Nil*" OR "Stephen*" OR "Stev*") w/15 AND ("V.P." OR "VP" OR "vice") w/15 AND ("elect*" OR "appoint*" OR "transition*" OR "made" OR "mak*" OR "demot*" OR "CFO" OR "C.F.O" OR "Chief" OR "business*" OR "operat*" OR "involuntar*" OR "voluntar*" OR "agree*") AND (Date>2003)[Lead Plaintiff does not agree to date limitation]</p> <p>[38,923 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query with the previously suggested date limiter, which would ensure that a range of documents likely to be responsive to Request No. 86 would meet this criterion.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>86. ("Notini*" OR "Bert*" OR "Albert*" OR "Al*") w/45 AND ("COO" OR ("chief" w/5 w/25"officer") OR "president") w/45 AND ("elect*" OR "appoint*" OR "hire*" OR "retain*" OR "transition*" OR "made" OR "mak*" OR "promot*" OR "hir*" OR "select*" OR "offer*" OR "salar*" OR "bonus*" OR "option*" OR "grant*" OR "awar*" OR "rewar*"))</p> <p>[73,920 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this proposed Query with the previously suggested date limiter (>2003), which would ensure that a range of documents likely to be responsive to Request No. 83 would meet this criterion. Without a numeric limiter, a whole host of personal and irrelevant documents mentioning any person's compensation but also mentioning Notini in any context, would meet this criterion. To more closely identify relevant documents, Sonus will agree to this Query if it is edited to include a numeric limiter of no more than 50. Without this numeric limiter, Sonus will not accept this Query. Sonus also premises its acceptance of this Query on the deletion of the term "Al*", which would capture all documents authored by, edited by, viewed by, or sent to or from any custodian in which any of the words "all," "always," "also" or "almost" or any other word beginning with "al" appears with any of the words after the "AND" limiter. As evidence of the vast overbreadth of this term, Sonus refers Lead Plaintiff to the words in Webster's Dictionary that begin with the root "Al*." These words comprise 17 legal-size dictionary pages in fine print. Lead Plaintiff cannot seriously maintain that "Al*" is an appropriate search term.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>87. ("Notini*" OR "Bert*" OR "Albert*" OR "Al*") AND ("memo*" OR "analy*" OR "assum*" OR "responsib*" OR "operat*" OR "accur*" OR "restat*" OR "re-stat*" OR "letter*" OR "correspond*" OR "e-mail*" OR "email*" OR "checklist*" OR "attach*" OR "analy*" OR "scop*" OR "engag*" OR "bill*" OR "invoic*" OR "payment*" OR "check*" OR "audit*" OR "compil*" OR "meet*" OR "mtg*" OR "confer*" OR "tele*" OR "disagr*" OR "delin*" OR "refus*" OR "termin*" OR "ceas*" OR "irreg*" OR "fraud*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "illeg*" OR "improp*" OR "JCFC" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistak*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "mistak*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "spread*")</p> <p>[599,095 hits]</p>	<p>NOT ACCEPT</p> <ul style="list-style-type: none"> • This proposed Query is beyond the scope of Plaintiff's Requests. • Sonus specifically objects to the following terms as overbroad and not tailored to identify documents relevant to the claims or defenses of the parties: "letter*," "correspond*," "e-mail*," "email*," "attach*," "checklist*," "attach*," "audit*," "compil*," "meet*," "mtg*," "confer*," "tele*." • Sonus also specifically objects to the inclusion of the root "Al*." As evidence of the vast overbreadth of this term, Sonus refers Lead Plaintiff to the words in Webster's Dictionary that begin with the root "Al*." These words comprise 17 legal-size dictionary pages in fine print. Lead Plaintiff cannot seriously maintain that "Al*" is an appropriate search term. • The 599,095 "hits" generated by this Query underscore its particularly egregious, overly broad and burdensome nature.
<p>88. ("Gruber*" OR "Rubin*") w/5 AND ("emeritus" OR "chairman" OR "chair*") w/5 AND ("elect*" OR "appoint*" OR "transition*" OR "made" OR "mak*" OR "promot*" OR "select*")) AND (Date >2003) [Lead Plaintiff does not agree to date limitation]</p> <p>[7,860 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> • Without numeric limiters, a whole host of personal and irrelevant documents mentioning any person's compensation but also mentioning Gruber in any context, would meet this criterion. To more closely identify relevant documents, Sonus will agree to this Query if it is edited to include numeric limiters of no more than 50. without this numeric limiter, Sonus will not accept this Query.
<p>89. ("document*" w/5 ("preserv*" OR "retain*" OR "retention" OR "destr*"))</p> <p>[3,320 hits]</p>	<p>ACCEPT</p>

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>90. (("document*" OR "police*" OR "proced*" OR "requir*") AND ("preserv*" OR "retain*" OR "retention" OR "desti*" OR "held*" OR "hold*" OR "elimin*" OR "delet*" OR "stor*" OR "backup*" OR "back-up*"))</p> <p>[259,326 hits]</p>	<p>NOT ACCEPT</p> <ul style="list-style-type: none"> • The 259,326 "hits" generated by this Query underscore its egregiously broad and burdensome nature. • Sonus is willing to discuss with Plaintiff including mutually acceptable terms from this Query in Query 89.
<p>91. (("board" OR "bd*" OR "directors" OR "dir*" OR "compensation committee" OR "audit committee" OR "committee*" OR "compen*" w/45 AND ("restat*" OR "re-stat*" OR "memo*" OR "letter*" OR "correspond*" OR "e-mail*" OR "email*" OR "checklist*" OR "attach*" OR "analy*" OR "scoop*" OR "engag*" OR "bill*" OR "invoice*" OR "payment*" OR "check*" OR "audit*" OR "compil*" OR "meet*" OR "mig*" OR "confer*" OR "tele*" OR "disagr*" OR "delin*" OR "refus*" OR "termin*" OR "ceas*" OR "irreg*" OR "fraud" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "illeg*" OR "improp*" OR "JCFC" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "mistak*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "spread*" OR "agend*" OR "video*" OR "audio*" OR "tape*" OR "taping*" OR "note*" OR "record*" OR "material*")) [To be run only on the custodial accounts of Hassan Ahmed, Stephen Nili, Charles Gray, Rubin Gruber, Edward Anderson, Paul Ferri, Paul Severino, H. Brian Thompson, John H. Cunningham, and Albert Notimi.] <i>Lead Plaintiff does not agree with custodial limitation</i></p> <p>[431,700 hits]</p>	<p>ACCEPT WITH EDITS VIA NO. 10 (DELETE AS DUPLICATIVE)</p> <ul style="list-style-type: none"> • This Query is duplicative of Query 10, which Sonus has accepted with edits. Sonus would accept this Query with the previously suggested numeric and custodial limiters, which would ensure that a range of documents likely to be responsive to Request No. 88, as limited by Sonus' Response No. 88, would meet this criterion. • Please explain what reasonable basis Plaintiff might have not to agree to such limitation. • The 431,700 "hits" generated by this Query underscore its egregiously broad and burdensome nature.

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>92. ("board" OR "bd*" OR "directors" OR "dir*" OR "compensation committee" OR "audit committee" OR "committee*" OR "compen*") w/15 AND ("Qwest" OR "Quest" OR "Qwest*" OR "Qwests*") [To be run only on the eustodial accounts of Hassan-Ahmed, Stephen-Nill, Charles-Gray, Rubin-Gruber, Edward-Anderson, Paul-Ferri, Paul-Severino, H. Brian-Thompson, John-H. Cunningham, and Albert-Nettini.] [Lead Plaintiff does not agree with custodial limitation]</p> <p>[59,184 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this Query with the previously suggested numeric and custodial limiters, which would ensure that a range of documents likely to be responsive to Request No. 88, as limited by Sonus' Response No. 88, would meet this criterion. Please explain what reasonable basis Plaintiff might have not to agree to such limitation. Sonus also premises its acceptance of this Query on the deletion of the terms "committee," "dir*," and "compen*," which are overbroad and likely to capture irrelevant documents, for example any document referring to Qwest and also mentioning any committee whatsoever, anyone's compensation, or containing the term "direct."
<p>93. ("board" OR "bd*" OR "directors" OR "dir*" OR "compensation committee" OR "audit committee" OR "committee*" OR "compen*") w/15 AND ("AT&T" OR "ATT" OR "ATWS" OR "AT and T" OR "ATandT" OR "AWS" OR "ATTWS" OR "A T and T" OR "A T & T" OR "AT+T" OR "A T + T" OR "AT&TW*" OR "ATTW*" OR "AT+TW*" OR "Wireless" OR "Wire-less") [To be run only on the eustodial accounts of Hassan-Ahmed, Stephen-Nill, Charles-Gray, Rubin-Gruber, Edward-Anderson, Paul-Ferri, Paul-Severino, H. Brian-Thompson, John-H. Cunningham, and Albert-Nettini.] [Lead Plaintiff does not agree with custodial limitation]</p> <p>[102,603 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> Sonus will accept this Query with the previously suggested numeric and custodial limiters, which would ensure that a range of documents likely to be responsive to Request No. 88, as limited by Sonus' Response No. 88, would meet this criterion. Please explain what reasonable basis Plaintiff might have not to agree to such limitation. Sonus also premises its acceptance of this Query on the deletion of the terms "committee," "dir*," and "compen*," which are overbroad and likely to capture irrelevant documents, for example any document referring to AT&T and also mentioning any committee whatsoever, anyone's compensation, or containing the term "direct."

<u>PROPOSED QUERY & HIT COUNTS</u>	<u>ACCEPT/NOT ACCEPT</u>
<p>94. (("estimat*" OR "project*" OR "forecast*" w/15 AND ("earning*" OR "revenue*" OR "price" OR "EPS") w/25 AND ("sector*" OR "competitor*" OR ("informat*" w/5 "tech*" OR "telecom*" OR "VOIP" OR "voice over" OR "Sonus*" OR "SONS*"))))</p> <p>[122,260 hits]</p>	<p>ACCEPT WITH EDITS</p> <ul style="list-style-type: none"> • Not tailored to identify documents relevant to the claims or defenses of the parties nor reasonably calculated to lead to the discovery of admissible evidence. • Sonus objects to Lead Plaintiff's addition of the overbroad terms "Sonus*" and "SONS." All documents authored, edited or viewed by or sent to or from any custodian (almost all of whom have "Sonus" email addresses or would have "Sonus" signature blocks) and which include references to "estimate*", "project*", or "forecast," in conjunction with "earning*" or "revenue*" or "price" or "EPS," would meet this criterion. Almost any document discussing forecasting for revenue on any account, any "estimate" or "project" on any account or for any customer, as well as almost any documents relating to the Company's stock, are a subject of the universe of documents that would satisfy this Query. Such Query is clearly outside the scope of documents Sonus is obligated to produce under any review of applicable discovery rules. • Sonus will accept this Query with the deletion of the terms "Sonus*" and "SONS," and the addition of the previously suggested numeric and custodial limiters, which would ensure that a range of documents likely to be responsive to Request No. 13, as limited by Sonus' Response No. 13, would meet this criterion. • The 122,260 "hits" generated by this Query underscore its overly broad and burdensome nature. • See also Sonus' Responses, General Objection no. 1. • Sonus is willing to discuss with Lead Plaintiff mutually acceptable edits to this Query that would render it more likely to yield a more tailored and less burdensome set of documents.

EXHIBIT A

20070516_noisewordlist.txt

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before
being
between
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20070516_noisewordlist.txt

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